

LITE DEPALMA GREENBERG, LLC

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ELYSEE NICOLAS, Individually and as	:	
representative of a class of participants	:	Civil Action No.: 17-3695 AET-DEA
and beneficiaries on behalf of the	:	
Princeton University 403(b) Plans,	:	
	:	
<i>Plaintiff,</i>	:	PLAINTIFF’S UNOPPOSED
	:	MOTION FOR APPROVAL OF
v.	:	ATTORNEY’S FEES, EXPENSES
	:	AND CLASS REPRESENTATIVE
THE TRUSTEES OF PRINCETON	:	SERVICE AWARD
UNIVERSITY,	:	
	:	
<i>Defendant.</i>	:	
	:	

Plaintiff Elysee Nicolas (“Plaintiff”) respectfully moves this Court for an Order awarding: (1) attorney’s fees in the amount of \$1,933,333 (one-third of the Settlement Fund) to Class Counsel; (2) reimbursement of \$32,389.21 in expenses that Class Counsel incurred in connection with this action, including \$15,000 to the Independent Fiduciary retained pursuant to the terms of the Settlement; and (3) a service award in the amount of \$7,500 to Plaintiff as the named Class Representative.

This motion is made pursuant to Federal Rule of Civil Procedure 23(h) and the Stipulation of Settlement (the “Settlement Agreement”) (ECF No. 59-1). The motion is based on the accompanying Memorandum of Law and the authorities cited therein, the declarations of Todd S. Collins, John Nestico, and Joseph DePalma and exhibits attached thereto, the Settlement Agreement, and all files, records and proceedings in this matter.

Counsel for Plaintiff has conferred with counsel for Defendant regarding this motion and have been advised that Defendant does not oppose this motion as parties to the Settlement.

Dated: November 24, 2020

LITE DEPALMA GREENBERG LLC

s/ Joseph J. DePalma

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CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2020, a true and correct copy of the foregoing document was filed with the Court utilizing its ECF system, which will send notice of such filing to all counsel of record.

/s/ Joseph J. DePalma

Joseph J. DePalma